

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Newport News Division)**

JOHN M. PITMAN, III, *et al.*,

Plaintiffs,

vs.

**XCENTRIC VENTURES, LLC, *et
al.*,**

Defendants.

Civil Action No. 4:16-cv-00179

DEFENDANT ANNA RICHTER'S MOTION TO COMPEL

Defendant Anna Richter moves this Court, pursuant to Fed. R. Civ. P. 33 and 34, to overrule plaintiffs' objections and compel plaintiffs John M. Pitman, III and Peninsula Plastic Surgery Center, LTD to respond to discovery. On April 5, 2017, Anna Richter served interrogatories and requests for production of documents on both plaintiffs. Plaintiffs objected to all the discovery requests and failed to meaningfully respond and produce responsive documents. The grounds for this motion are set forth in the accompanying memorandum, the contents of which are incorporated herein.

Meet And Confer Statement

Undersigned counsel engaged in good faith efforts to resolve the issues raised in this Motion with counsel for plaintiffs before filing this motion. They were unable to resolve the dispute.

Dated: July 24, 2017

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Certificate of Service

I hereby certify that on July 24, 2017, I filed the foregoing using the Clerk's CM/ECF system, which will provide notice to all counsel of record.

By: /s/ Louise T. Gitcheva
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